

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	
MAXUS ENERGY CORPORATION, <i>et al.</i> ,)	Chapter 11
)	
Debtors.)	Case No. 16-11501 (CSS)
)	
)	Jointly Administered
)	
MAXUS LIQUIDATING TRUST,)	
)	
Plaintiff,)	
)	
v.)	Adversary Proceeding
)	
YPF S.A., YPF INTERNATIONAL S.A., YPF)	Adv. Proc. No. 18-50489 (CSS)
HOLDINGS, INC., CLH HOLDINGS, INC.,)	
REPSOL, S.A., REPSOL EXPLORACIÓN, S.A.,)	
REPSOL USA HOLDINGS CORP., REPSOL)	
E&P USA, INC., REPSOL OFFSHORE E&P)	
USA, INC., REPSOL E&P T&T LIMITED, and)	
REPSOL SERVICES CO.,)	
)	
Defendants.)	

REPSOL DEFENDANTS' MOTION FOR WITHDRAWAL OF THE REFERENCE

Pursuant to 28 U.S.C. §157(d), Rule 5011(a) of the Federal Rules of Bankruptcy Procedure (the “Federal Rules”), and Rule 5011-1 of the Local Rules (the “Local Rules”) of the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), Defendants Repsol, S.A., Repsol Exploración, S.A., Repsol USA Holdings Corp., Repsol E&P USA, Inc., Repsol Offshore E&P USA, Inc., Repsol E&P T&T Limited, and Repsol Services Company (collectively, “Repsol”) respectfully move the United States District Court for the District of Delaware (the “District Court”) to withdraw the reference regarding the claims asserted by the Maxus Liquidating Trust (“MLT”) against Repsol in its complaint (“Complaint”)

(A.D.I. 1), the grounds for which are set forth in the memorandum of law filed concurrently herewith (the “Memorandum of Law”).

WHEREFORE, Repsol respectfully requests that the District Court enter an order substantially in the form attached hereto as **Exhibit A**: (i) granting the relief requested in this Motion; and (ii) granting such other and further relief as may be just and proper.

Dated: June 7, 2019
Wilmington, Delaware

/s/ Daniel B. Butz

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Inc., Repsol E&P T&T Limited, and Repsol Services
Company*

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MAXUS ENERGY CORPORATION, *et al.*,

Debtors.

MAXUS LIQUIDATING TRUST,

Plaintiff,

V.

YPF S.A., YPF INTERNATIONAL S.A., YPF HOLDINGS, INC., CLH HOLDINGS, INC., REPSOL, S.A., REPSOL EXPLORACIÓN, S.A., REPSOL USA HOLDINGS CORP., REPSOL E&P USA, INC., REPSOL OFFSHORE E&P USA, INC., REPSOL E&P T&T LIMITED, and REPSOL SERVICES CO.,

Defendants.

Chapter 11

Case No. 16-11501 (CSS)

Jointly Administered

Adversary Proceeding

Adv. Proc. No. 18-50489 (CSS)

Re: D.I. _____

ORDER GRANTING REPSOL DEFENDANTS' MOTION FOR WITHDRAWAL OF THE REFERENCE

Upon the motion (the “Motion”)¹ of Defendants Repsol, S.A., Repsol Exploración, S.A., Repsol USA Holdings Corp., Repsol E&P USA, Inc., Repsol Offshore E&P USA, Inc., Repsol E&P T&T Limited, and Repsol Services Company (collectively, “Repsol”) for entry of an order (this “Order”) to withdraw the reference regarding the claims asserted by the MLT against Repsol in the Complaint; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and appropriate notice of and opportunity for a hearing on the Motion having

¹ Capitalized terms not defined herein are defined in the Motion or the Memorandum of Law.

been given; and the Court having reviewed the Motion and its supporting Memorandum of Law; and the Court having determined that the legal and factual bases set forth in the Motion and its supporting Memorandum of Law establish just cause for the relief granted herein; and all objections to the Motion having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED that:

1. The Motion is GRANTED.
2. The Court shall withdraw the reference as to each of the Counts (Counts I through XXIII) against Defendants Repsol, S.A., Repsol Exploración, S.A., Repsol USA Holdings Corp., Repsol E&P USA, Inc., Repsol Offshore E&P USA, Inc., Repsol E&P T&T Limited, and Repsol Services Company set forth in the Complaint.
3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: _____, 2019
Wilmington, Delaware

RICHARD G. ANDREWS
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Daniel B. Butz, certify that I am not less than 18 years of age, and that service of the foregoing *Repsol Defendants' Motion for Withdrawal of the Reference* was caused to be made on June 7, 2019, in the manner indicated upon the parties identified below:

Date: June 7, 2019

/s/Daniel B. Butz

Daniel B. Butz (No. 4227)

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